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States Government

Department of Energy

DUE  
DATE 7-13-93

## Memorandum

JUN 3 7 34 AM '93 Rocky Flats Office

ACTION Benedetti

DIST. LTR ENC

BENEDETTI, R.L.	<input checked="" type="checkbox"/>
BENJAMIN, A.	<input type="checkbox"/>
BERMAN, H.S.	<input type="checkbox"/>
CARNIVAL, G.J.	<input type="checkbox"/>
COPP, R.D.	<input type="checkbox"/>
CORDOVA, R.C.	<input type="checkbox"/>
DAVIS, J.G.	<input type="checkbox"/>
FERRERA, D.W.	<input type="checkbox"/>
HANNI, B.J.	<input type="checkbox"/>
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HEDAH, T.G.	<input type="checkbox"/>
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KIRBY, W.A.	<input type="checkbox"/>
KUESTER, A.W.	<input type="checkbox"/>
LEE, E.M.	<input type="checkbox"/>
MANN, H.P.	<input type="checkbox"/>
MARX, G.E.	<input type="checkbox"/>
McKENNA, F.G.	<input type="checkbox"/>
MORGAN, R.V.	<input type="checkbox"/>
PIZZUTO, V.M.	<input type="checkbox"/>
POTTER, G.L.	<input type="checkbox"/>
RILEY, J.H.	<input type="checkbox"/>
SANDLIN, N.B.	<input type="checkbox"/>
SATTERWHITE, D.G.	<input type="checkbox"/>
SCHUBERT, A.L.	<input type="checkbox"/>
SETLOCK, G.H.	<input type="checkbox"/>
SHEPLER, R.L.	<input type="checkbox"/>
SULLIVAN, M.T.	<input type="checkbox"/>
SWANSON, E.R.	<input type="checkbox"/>
WILKINSON, R.B.	<input type="checkbox"/>
WILSON, J.M.	<input type="checkbox"/>
ZANE, J.O.	<input type="checkbox"/>

Greengard	<input type="checkbox"/>
Anderson	<input checked="" type="checkbox"/>
Dille	<input checked="" type="checkbox"/>
Bontius	<input checked="" type="checkbox"/>
Vess	<input checked="" type="checkbox"/>
Taylor	<input checked="" type="checkbox"/>

CORRES CONTROL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
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Reviewed for Addressee  
Corres. Control RFP6-3-93  
DATE BY

Ref Ltr. #

JUN 02 1993

ERD:SG:00981

Operable Unit 2 Surface Water IM/IRA Data Analysis

Robert Benedetti, Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats, Inc.

This memorandum concerns the data from collection sources for the Operable Unit 2 (903 Pad, Mound, and East Trenches) Surface Water Interim Measure/Interim Remedial Action (IM/IRA). Information contained in the OU2 IM/IRA Phase I Treatability Report document transmitted to EPA and CDH on June 2, 1992, indicated that collection source SW-61 was contaminated with plutonium averaging 0.6 pCi/l during operation of the first phase (Granular Activated Carbon treatment) of the IM/IRA. Our review of the data from the Rocky Flats Environmental Data System (RFEDS) indicates that SW-61 averaged less than the 0.05 pCi/l ARAR during the operation of the first phase (March 11, 1991 through April 27, 1992). During the same time period, the influent to the IM/IRA treatment system was reported to not exceed 0.02 pCi/l. Since the flow from SW-59 is upgradient and contributes to SW-61, use of data prior to startup of collection of SW-59 is misleading, particularly when used to compare to the influent to the IM/IRA treatment system. Additionally, we have determined that "non-detects" were not used in the EG&G evaluation. As a result of the reported discrepancy, we have been attempting to explain the discrepancy to ourselves and the EPA/CDH, when in fact, no discrepancy exists.

Our March 30, 1992, letter (92-DOE-3408) to EPA and CDH transmitting the draft document summarizing the first phase of the IM/IRA contained the following comment:

The document should also include discussion of quantity and quality from the collection sources, SW-59 and SW-61. Because of the overall low concentrations of contaminants, it may be possible to determine that concentrations exceeding the ARAR are from SW-59 rather than SW-61 (or SW-132). If so, this document should recommend collection from SW-59 only, in order to conduct meaningful treatability testing of the GAC and the metals/Radionuclide Removal System (RRS), when operational in April 1992. Otherwise, and in particular, the low concentrations of radionuclides will make testing inconclusive.

The EPA concurred with this comment, as stated in their May 4, 1992, letter. However, because of the inaccurate information contained in the Phase I final document, no further action was taken to review data in an attempt to propose discontinuation of collection from SW-61, and to not begin collection from SW-132.

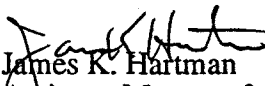
A-DU02-000901

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Although our review of RFEDS data indicates the presence of 1, 2-dichloroethene at SW-61 during the time after startup, an **aggressive** review of analytical data must be completed. The purpose of the data review will be to determine the extent of contamination and to compare against such things as data outliers, flow at each source, periods when the collection system was inoperable, etc. This information will be the basis for a determination of whether to propose to discontinue collection of water at SW-61 and SW-132. The assessment must be conducted by appropriate staff who understand the goal of the assessment, preferably a geo-statistician. Additionally, an assessment of risk for various collection scenarios should be conducted.

The data and risk assessments must be an integral part of the IAG Phase II deliverable summarizing results of the testing of the complete IM/IRA treatment system, due in draft to EPA and CDH July 13, 1993. The final Phase II document is due to EPA and CDH September 8, 1993.

If you have any questions about this, please contact Scott Grace at extension 7199.

  
James K. Hartman  
Assistant Manager for Transition  
and Environmental Restoration

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